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Attorney for Defendant Experian Information Solutions, Inc.

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY (CAMDEN)

KENNETH BARBAGLI, JR., Plaintiff,

tiff.

Civil Action No. 1:11-cv-04921

Hon. Joseph H. Rodriguez

v.

TRANS UNION, LLC, et al.,

Defendants.

## MOTION FOR ADMISSION PRO HAC VICE OF IRA M. KAROLL

THE UNDERSIGNED, Dorothy A. Kowal, pursuant to Local Rule of Civil Procedure 101.1(c), and as a member of the Bar of the United States District Court for the District of New Jersey, respectfully moves that Ira M. Karoll, an attorney with the firm of Jones Day, 500 Grant Street, 45th Floor, Pittsburgh, Pennsylvania, 15219, be admitted to appear and practice in this Court in the instant case as counsel *pro hac vice* for Defendant Experian Information Solutions, Inc. ("Experian"). In support of this motion I state:

- 1. I am a member of the New Jersey bar in good standing.
- Ira M. Karoll was admitted to the Bar of the Supreme Court of the
   Commonwealth of Pennsylvania in April 2011 and is a member of that Bar in good standing.
- 3. The address of the office maintaining the role of the Bar of the Supreme Court of the Commonwealth of Pennsylvania is Attorney Registration Office; PA Judicial Center; 601 Commonwealth Avenue, Suite 5600; PO Box 62625; Harrisburg, PA 17106.

- 4. Ira M. Karoll is a member of the Bar in good standing in every jurisdiction in which he has been admitted to practice. A copy of his Affidavit in support of this motion is attached hereto.
- 5. There are no disciplinary proceedings pending against Ira M. Karoll in any jurisdiction in which he is admitted to practice.
- 6. Ira M. Karoll is familiar with the Local Rules of the United States District Court for the District of New Jersey.
- 7. I will be responsible for the conduct of Ira M. Karoll and the case and will ensure Ira M. Karoll complies with L.Civ.R. 101.1(c).
  - 8. Plaintiff's counsel does not object to the application by Ira M. Karoll.

I certify that I know that the applicant is a member in good standing of the Bar of the Supreme Court of the Commonwealth of Pennsylvania and that the applicant's private and professional character is good.

WHEREFORE, his admission is moved this 10<sup>th</sup> day of November, 2011.

Respectfully submitted,

/s/ Dorothy A. Kowal

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Counsel for Defendant Experian Informatino

Solutions, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 10, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing the same to be served on each of the following via ECF Notification:

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/s/ Dorothy A. Kowal
Dorothy A. Kowal, Esq.